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**Writer's Direct Access**  
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October 2, 2019

**Via FOIAonline**

National FOIA Office  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW (2310A)  
Washington, DC 20460

**Re: FOIA Request on TSCA Reagents Under 40 C.F.R. § 720.36**

Dear Sir or Madam:

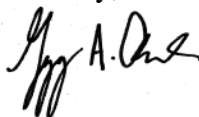
Pursuant to the Freedom of Information Act (FOIA) (5 U.S.C. § 552), and EPA's freedom of information regulations, I am writing to request all prenotice communications and other EPA correspondence since November 1986 concerning reagent chemical substances exempt from Toxic Substances Control Act (TSCA) (15 U.S.C. § 2601 *et seq.*) section 5 requirements pursuant to 40 C.F.R. § 720.36 ("R&D exemption").

More specifically, we are seeking EPA correspondence that addresses the scope of the R&D exemption for chemical substances that are used (whether in neat form or as part of a mixture):

- As reagents inside a laboratory, on a production floor, or in an outdoor environment;
- As intermediates used to manufacture chemical reagents; and
- In quality control and/or quality assurance analyses.

We agree to pay reasonable search and reproduction costs for this information, up to \$350. A quick response would be greatly appreciated. If you have any questions concerning this request, please do not hesitate to contact me at (202) 434-4302 or clarkg@khlaw.com. Thank you in advance for your assistance.

Sincerely,



Gregory A. Clark